

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

BIG LOTS, INC., *et al.*,

Debtors.<sup>1</sup>

Chapter 11

Case No. 24-11967 (JKS)

(Jointly Administered)

**EX PARTE APPLICATION TO APPEAR PURSUANT TO LOCAL RULE 9010-1(e)(ii)**

I, Gregory G. Hesse, a partner with the law firm of Hunton Andrews Kurth LLP, respectfully request the approval of this Court to appear in the above-captioned chapter 11 cases (the “Chapter 11 Cases”) on behalf of 1255 Sunrise Realty, LLC (“1255 Sunrise”), 4101 Transit Realty LLC (“4101 Transit”), The Stop & Shop Supermarket Company LLC (“Stop & Shop”), and Food Lion LLC (“Food Lion” and, together with 1255 Sunrise, 4101 Transit, and Stop & Shop, the “Landlords”) pursuant to Rule 9010-1(e)(ii) of the Local Rules of Bankruptcy Practice and Procedure of the United States Bankruptcy Court for the District of Delaware (the “Local Rules”), and state as follows:

1. Local Rule 9010-1(e)(ii) provides that “[a]ttorneys who are admitted to the Bar of the District Court and in good standing, but who do not maintain an office in the District of Delaware, may appear on behalf of parties upon approval by the Court.”

2. The Landlords have retained my firm, Hunton Andrews Kurth LLP, as counsel in these Chapter 11 Cases. I am a member in good standing of the Bar of the United States District

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<sup>1</sup> The debtors and debtors in possession in these chapter 11 cases, along with the last four digits of their respective employer identification numbers, are as follows: Great Basin, LLC (6158); Big Lots, Inc. (9097); Big Lots Management, LLC (7948); Consolidated Property Holdings, LLC (0984); Broyhill LLC (7868); Big Lots Stores - PNS, LLC (5262); Big Lots Stores, LLC (6811); BLBO Tenant, LLC (0552); Big Lots Stores - CSR, LLC (6182); CSC Distribution LLC (8785); Closeout Distribution, LLC (0309); Durant DC, LLC (2033); AVDC, LLC (3400); GAFDC LLC (8673); PAFDC LLC (2377); WAFDC, LLC (6163); INFDC, LLC (2820); Big Lots eCommerce LLC (9612); and Big Lots F&S, LLC (3277). The address of the debtors’ corporate headquarters is 4900 E. Dublin-Granville Road, Columbus, OH 43081.

Court for the District of Delaware, but do not maintain an office in the District of Delaware. My office is located in Dallas, Texas, at the address indicated below.

3. The Landlords are creditors and lease counterparties (each for a single store location with the exception of Food Lion, which is the sublandlord for two store locations) in these Chapter 11 Cases. I anticipate that the Landlords involvement in these Chapter 11 Cases will be limited. The Landlords intend to retain local counsel to the extent an appearance at a in-person hearing becomes necessary. Accordingly, I do not anticipate that any problems will arise from not now employing additional counsel with a physical office in the District of Delaware in connection with my firm's representation of the Landlords in this matter. If any such problems do arise, then this issue can be revisited at that time.

WHEREFORE, I respectfully request that the Court enter an order, a proposed form of which is annexed hereto as **Exhibit 1**, approving my appearance in the Chapter 11 Cases on behalf of the Landlords pursuant to Local Rule 9010-1(e)(ii).

Dated: November 5, 2024  
Dallas, Texas

Respectfully submitted,

**HUNTON ANDREWS KURTH LLP**

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